

## **Exhibit 2**



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March 26, 2013

**VIA EMAIL**

Colin Kass, Esq.  
Proskauer Rose, LLP  
1001 Pennsylvania Ave., NW  
Suite 400 South  
Washington, DC 20004-2533

Re: Castro, et al. v. Sanofi Pasteur Inc. - 2:11-cv-07178 (JLL) (MAH) (the "Matter")

Dear Mr. Kass:

Thank you for your March 20, 2013 letter (the "March 20 Letter") regarding the production of documents by Navigant Economics, LLC ("Navigant Economics") in response to Sanofi Pasteur Inc.'s ("Sanofi") February 26, 2013 subpoena (the "Subpoena"). In response to the March 20 Letter, I am writing to clarify the statements in our March 18, 2013 letter (the "March 18 Letter"). Navigant Economics intends to proceed as follows, subject to the Subpoena's instructions and specifications and the March 18 Letter:

1. With respect to (a) the retention of Navigant Economics by Novartis Vaccines and Diagnostics, Inc. ("Novartis"), and/or (b) documents created prior to the retention of Navigant Economics by Plaintiffs' counsel, Navigant Economics will produce copies of responsive, non-privileged, located documents in its possession, custody or control on or before March 28, 2013.
2. With respect to documents created after the retention of Navigant Economics by Plaintiffs' counsel that relate to Navigant Economics' retention by Plaintiffs' counsel, Navigant Economics will proceed in accordance with its contractual obligations to Plaintiffs' counsel and be guided by the court's ruling on Plaintiffs' counsel's motion to quash and/or for a protective order.

As discussed, we understand that the documents produced by Navigant Economics will be subject to, and deemed "Attorneys' Eyes Only" under, the Discovery Confidentiality Order in the Matter, dated August 10, 2012 (the "Discovery Order"). We further understand that Sanofi, the Plaintiffs and Novartis have agreed that clause IV(C)(5) of the Discovery Order has been deemed to allow disclosure of documents or information that Novartis has designated "Attorneys' Eyes Only" to a current or former Novartis employee only if either clause IV(C)(5)(ii) or IV(C)(5)(iii) of the Discovery Order is satisfied.

Please let me know if you would like to discuss the foregoing.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rahsaan Sales".

Rahsaan Sales  
Assistant General Counsel